

January 13, 2015

Via ECF

The Honorable Sandra L. Townes
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Roman Johnson*
Case No. 14-CR-278 (SLT)

Dear Judge Townes:

As Your Honor is aware, this law firm represents the defendant Roman Johnson in the above-referenced criminal action. We write on behalf of both parties to respectfully request that the upcoming status conference, scheduled for Thursday, January 15, 2015, at 2:30 p.m., be adjourned until Tuesday, February 10. This case raises complex issues of fact and law, but the parties believe that additional time for plea discussions may resolve those issues and result in the disposition of this case in the next few weeks.

We have advised the defendant of his rights under the Speedy Trial Act, the defendant understands those rights, and the defendant consents to excluding the time between January 15, 2015 and February 10, 2015 in computing the time within which trial must commence. Under these circumstances, the parties respectfully submit that an adjournment would serve the ends of justice and the defendant by giving the parties adequate time to focus on resolving the outstanding issues without unnecessarily taxing the resources of the Court.

Thank you for your consideration.

Very truly yours,

GOTTLIEB & GORDON LLP

/s/ Robert C. Gottlieb (RG1930)

Robert C. Gottlieb (RG1930)

cc: Bryan Fields, A.U.S.A. (via ECF and email)